

COMPLAINT

TO: Dennis Unsworth, Montana Commissioner of Political Practices
FROM: Tim Fox, Republican candidate for Attorney General
RE: Official complaint against Citizens for Strong Law Enforcement
DATE: June 2, 2008

RECEIVED
COMMISSIONER OF
POLITICAL PRACTICES
2008 JUN -2 P 4: 33


Please let this letter serve as a campaign practices complaint against Citizens for Strong Law Enforcement, against the group's treasurer, Thomas E. Boland, and against all those who contributed, or will contribute, to this group, for violations committed prior to the June 3rd Primary Election. Please see below for more details on the complaint. I'd be happy to provide more information upon request.

Statement of Facts

1. On May 31, 2006, the Tim Fox for Attorney General Campaign began fielding calls from supporters who had received automated phone messages. The content of the message attacked Tim Fox and urged voters to support Lee Bruner for Attorney General.
2. Tim Fox and Lee Bruner are both Republican candidates for Attorney General
3. The message contained the disclaimer language "Paid for by Citizens for Strong Law Enforcement." What is represented here is the entirety of the disclaimer language.
4. Citizens for Strong Law Enforcement filed Form C-2 with the Commissioner of Political Practices on May 29, 2008 as a Political Action Committee.
5. The Clean Campaign Act (MCA 13-35-402) requires a political committee to provide candidates with "any final copy of campaign advertising in print media, in printed material, or by broadcast media that is intended for public distribution the 10 days prior to an election."
6. A final copy of the autodial messages was not provided to the Tim Fox campaign prior to dissemination.
7. MCA 13-35-225 requires campaign materials that advocate the election or defeat of a candidate must include a disclaimer with the name of the committee treasurer as well as the mailing address of either the committee or the committee treasurer.
8. The autodial campaign material did not contain either the name of the committee treasurer nor an address for the committee or the committee treasurer.

Conclusions

1. Citizens for Strong Law Enforcement are in violation of the Montana Clean Campaign Act by not providing a copy of the campaign material to the Tim Fox campaign.
2. Citizens for Strong Law Enforcement are in violation of 13-35-225 by not providing a "paid for by" disclaimer on the campaign material in question.



CHARLES D ENOW H

6/2/08

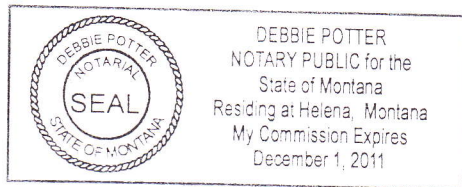
DATE

In relation to the attached document titled Complaint dated 6/2/2008:

State of Montana
County of Lewis and Clark

On this 2nd day of June, 2008, before me a Notary Public for the State of Montana, personally appeared Charles Denowh known to me to be the person/s whose name is subscribed to the foregoing instrument and acknowledged to me that he executed the same.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my Notarial Seal the day and year first above written.



A handwritten signature in cursive script, appearing to read "Debbie Potter".

Notary Public for the State of Montana
Residing at Helena, Montana
My Commission expires: 12/1/2011

POSTMARKED

JUN 11 2008

RECEIVED
COMMISSIONER OF
POLITICAL PRACTICES

2008 JUN 12 A 9:25

June 10, 2008

Commissioner of Political Practices Dennis Unsworth
PO Box 202401
Helena, MT 59620

Dear Commissioner Unsworth:

This letter is in response to your letter dated June 9, 2008 regarding additional information required for the complaint I filed against Citizens for Strong Law Enforcement.

The complete name and mailing address of the person filing the complaint is Charles Denowh at PO Box 1743, Helena, MT 59624.

The complete mailing address of the alleged violator, Citizens for Strong Law Enforcement, is PO Box 2949, Great Falls, MT 59403.

You are correct in your interpretation that the complaint was intended to be filed by me, and not Tim Fox. As such, the verified signature on the original complaint should suffice.

Please let me know if you require any additional information.

Sincerely,



CHARLES DENOWH